



THE CITY OF NEW YORK
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BY ECF

Hon. James C. Francis, IV
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write jointly with plaintiffs' counsel in order to request an additional one-week extension of the stay of all Court-ordered deadlines related to class issues granted by Your Honor on June 23, 2014 (DE 139). If granted, this request would extend the stay through July 18, 2014. About two weeks ago, on June 26, 2014, plaintiffs' counsel forwarded a proposed Memorandum of Understanding ("MOU") setting forth a general framework for resolution of key issues regarding the claims brought on behalf of the plaintiff class. During the next two weeks, our legal team including the Corporation Counsel reviewed the proposed MOU, as did the Commissioner of the Department of Correction and his key personnel. Yesterday we provided our comments to the proposed MOU, and we are hopeful that the parties can agree on its terms and move forward with substantive settlement discussions. We seek one additional week's time in order to allow for further discussion of the City's comments. We thank Your Honor in advance for considering this request.

Respectfully submitted,

/s/

Arthur G. Larkin (AL 9059)
Assistant Corporation Counsel

AGL/m

cc: All Counsel (by ECF)